Postal Rate Commission Submitted 11/4/2002 2:26 pm Filing ID: 35698

## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

EXPERIMENTAL RATE AND SERVICE CHANGES TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS JAMES D. WILSON TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T4-12)

The United States Postal Service hereby provides the responses of witness Wilson to the following interrogatories of Office of the Consumer Advocate:

OCA/USPS-T4-12, filed on October 25, 2002.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-3089 Fax -5402 November 4, 2002

## RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILSON TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

**OCA/USPS-T4-12.** Please refer to your response to OCA/USPS-T4-9(d). Please provide the figures, and the citations thereto, used in the formula that estimates the "\$15.00 [cost] per First-Class Mail enrollee in the ACS program."

## **RESPONSE:**

The following estimates were used in the calculation of the cost to enroll a First-Class mailer in the ACS program:

Annual contract labor costs of ACS employees: \$ 175,000	Annual contract	labor costs of ACS e	mplovees:	\$ 175,000
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Percent of time spent on enrolling customers 50%

in ACS (all mail classes):

Total number of First-Class ACS customers (FY02): 1500

Total number of all ACS customers (FY02): 6000

The formula used to calculate the cost using the above data assumptions was:

(Labor costs \* % of time spent on enrollment \* % First-Class of ACS / First-Class ACS Participants)

(175,000 \* .5 \* (1500/6000) / 1500) = \$ 14.58

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 November 4, 2002